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5 Attorneys for Defendant  
6 KATHERINE PRINCE

7  
8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

10  
11 DANE SHIKMAN,

12 Plaintiff,

13 vs.

14 COUNTY OF LAKE; COUNTY OF LAKE  
SHERIFF BRIAN MARTIN; CAPTAIN  
15 GREG HOSMAN; SERGEANT RENEE  
LEFFLER; OFFICER JAMES RHINE;  
16 OFFICER DOUGLAS ALEMAN; OFFICER  
KATHERINE PRINCE; OFFICER JARED  
17 MCCOLOUGH; OFFICER JOSHUA  
PHILLIPI; DEPUTY KALEN BROCK  
18 WALDER; DEPUTY MICHAEL DAVIS;  
CALIFORNIA FORENSIC MEDICAL  
19 GROUP; TAYLOR FITHIAN, M.D.;  
ROBBIN BRIGGS; MONIQUE QUILLEN;  
20 MANDY ROBBINS; ALISHA  
STOTTSBERRY; and DOES 1-50,

21 Defendants.  
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Case No.: 1:16-CV-05121-RMI

**DECLARATION OF KATHERINE  
PRINCE IN SUPPORT OF DEFENDANT  
OFFICER KATHERINE PRINCE'S  
MOTION FOR SUMMARY JUDGMENT  
PURSUANT TO F.R.C.P., RULE 56**

Date: April 20, 2018  
Time: 10:00 a.m.  
Judge: Hon. Robert M. Illman

Complaint Filed: 6/14/16  
Trial date: June 4, 2018

23 I, KATHERINE PRINCE, declare as follows:

- 24 1. I have personal knowledge of the matters contained herein and, if called to do so, could and  
25 would testify to the facts set forth in this declaration.  
26 2. At the time of Elizabeth Gaunt's ("Ms. Gaunt") detainment from August 1 to August 2,  
27 2015, I was working as a Correctional Officer in the Lake County Jail in Lakeport, CA.  
28 3. At the time of the incident underlying this case, I had approximately 11 years of experience

1 working as a correctional officer.

2 4. In the course of my work as a correctional officer, I would regularly perform cell checks on  
3 inmates for their safety and the safety of others.

4 5. Ms. Gaunt was detained in a sobering cell at the Lake County Jail, which contained a  
5 privacy wall that was placed in front of a toilet, as well as CCTV cameras that provided  
6 clear color video to monitors in the booking area.

7 6. During the course of Ms. Gaunt's detainment at the Lake County Jail in August 2015, I  
8 performed cell checks on multiple occasions, once on August 1, 2015, and several times on  
9 August 2, 2015.

10 7. It was experience that correctional officers at the Lake County Jail would inform other  
11 correctional officers handling a particular inmate's cell check of any important issues  
12 regarding that inmate.

13 8. During the detainment of Ms. Gaunt from August 1 to August 2, 2015, I was not notified by  
14 anyone that Ms. Gaunt made any request for a doctor.

15 9. During the detainment of Ms. Gaunt from August 1 to August 2, 2015, I was not notified by  
16 anyone prior to Ms. Gaunt's death that she had previously undergone a California Welfare  
17 and Institutions Code, section 5150, mental health evaluation.

18 10. During the detainment of Ms. Gaunt from August 1 to August 2, 2015, I was not notified by  
19 anyone prior to Ms. Gaunt's death that she was uncooperative.

20 11. During the detainment of Ms. Gaunt from August 1 to August 2, 2015, I was not notified by  
21 anyone prior to Ms. Gaunt's death that she refused to answer medical questions.

22 12. During the detainment of Ms. Gaunt from August 1 to August 2, 2015, I was not notified by  
23 anyone prior to Ms. Gaunt's death that she stated she thought she had mites or spiders  
24 crawling under her skin

25 13. During the detainment of Ms. Gaunt from August 1 to August 2, 2015, I was not notified by  
26 anyone prior to Ms. Gaunt's death of facts raising a concern of suicidal intent on the part of  
27 Ms. Gaunt.

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1 Executed this 28<sup>th</sup> day of February, 2018 at Sacramento, California.

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3 /s/ Katherine Prince  
4 Katherine Prince  
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**E-Filing Signature Attestation**

I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/S/) within this e-filed document.

Executed this 28<sup>th</sup> day of February, 2018 at Sacramento, California.

/s/ Domenic D. Spinelli

Domenic D. Spinelli